

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

STEVEN G. MILLETT, MELODY G. MILLETT,)	
On Behalf Of Themselves and All Others)	
Similarly Situated,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 05-599-SLR
)	
TRUELINK, INC.,)	
A Trans Union Company,)	
)	
Defendant.)	

EXHIBIT NO. 1 TO PLAINTIFFS' REPLY TO DEFENDANT'S
ANSWERING BRIEF IN OPPOSITION TO DEFENDANT'S
MOTION FOR PARTIAL SUMMARY JUDGMENT

Christopher J. Curtin, Esquire
MacElree Harvey, Ltd.
5721 Kennett Pike
Centreville, DE 19807
Phone: 302.654.4454
Facsimile: 302.654.4954
Email: ccurtin@macelree.com
Website: macelree.com

COUNSEL FOR PLAINTIFFS
STEVEN G. MILLETT
AND MELODY J. MILLETT

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REPLY EXHIBIT 1

1 So what typically happens is the customer
2 is advised -- when a fraud alert is on the
3 file, a customer is advised to call customer
4 service. They are not able to -- at least I
5 think at this time they are not able to pass
6 the identity confirmation system online.

7 So they would be asked to call us where we
8 would ask additional questions as kind of a
9 second check to make sure we were giving the
10 information to the right individual.

11 BY MS. YEAGER:

12 Q. Can you tell from looking at TLM 18178,
13 Exhibit No. 1, which product was purchased by
14 Steven Millett?

15 A. I can't.

16 Q. Can you tell from the same exhibit which
17 product was purchased by Melody Millett?

18 A. No.

19 Q. Why would a consumer purchase the
20 TrueCredit product?

21 MR. O'NEIL: Objection, calls for
22 speculation. Do you have any particular
23 consumer in mind or -- it's also vague.

24 THE WITNESS: Yeah, my experience is
25 consumers have a variety of reasons for

1 purchasing our products.

2 BY MS. YEAGER:

3 Q. Could you list those, please?

4 MR. O'NEIL: Objection, vague, lack of
5 foundation.

6 THE WITNESS: They are interested in
7 managing their credit. Many consumers tell us
8 that they are getting ready to make a major
9 purchase like a home or a car and want to
10 watch their credit report for the period of
11 time that they are engaged in that. Some
12 consumers tell us that they are concerned
13 about identity theft, so they purchase the
14 product for that purpose. Those would be the
15 main reasons.

16 BY MS. YEAGER:

17 Q. In what manner is the product useful for
18 your customers who are concerned about identity
19 left?

20 MR. O'NEIL: What -- what product?

21 MS. YEAGER: Thank you. Let me clarify
22 that.

23 BY MS. YEAGER:

24 Q. In what manner -- in what manner would the
25 TrueCredit product be of assistance to one of your